

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

KAMILAH JOLLY; DIEGO ALVAREZ-
MIRANDA EZPELETA; and VAUGHN BOBB-
WILLIS; individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

FURTHERED, INC. d/b/a LAWLINE, INC.,

Defendant.

Case No. 1:24-cv-06401-LJL

(consolidated with Case No. 1:24-cv-06709)

Hon. Lewis J. Liman

**NOTICE OF DEFENDANT’S MOTION TO STAY CASE PENDING
MOTION TO DISMISS SECOND AMENDED CLASS ACTION COMPLAINT**

PLEASE TAKE NOTICE that upon the Memorandum of Law, Defendant FurtherEd, Inc. d/b/a Lawline (“Defendant”) hereby respectfully moves this Court, before the Honorable Lewis J. Liman, United States District Judge for the Southern District of New York, at the United State Courthouse, Courtroom 15C, 500 Pearl Street, New York, NY 10007, for an order to stay this case, including all discovery, pending orders on motions to dismiss filed by defendants on the same grounds in two nearly identical cases: *Macalpine et al. v. Omnit Labs, Inc.*, No. 1:24-cv-00933-DII (W.D. Tex. Aug. 15, 2024) and *Golland et al. v. Major League Baseball Advanced Media, L.P.*, No. 1:24-cv-06270 (S.D.N.Y. Aug. 20, 2024), and/or an order on Defendant’s Motion to Dismiss Plaintiffs’ Second Amended Class Action Complaint in the instant action and granting such further relief as the Court deems proper and just.

Dated: February 28, 2025

MINTZ LEVIN COHN FERRIS
GLOVSKY AND POPEO, P.C.

By 
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**Admitted Pro Hac Vice*

CERTIFICATE OF SERVICE

I hereby certify that on February 28, 2025, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.



Joshua Briones